

District Judge James L. Robart

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JULIO CURY, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF STATE, *et al.*,

Defendants.

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Civil Action No.: 2:23-cv-00499-JLR

PLAINTIFFS' UNOPPOSED
EMERGENCY MOTION TO SEAL

Plaintiffs hereby request that the Court immediately seal Dkt. #23-1, which is Exhibit 1 to the Howard Declaration filed with Defendants' Motion for Summary Judgment. These records include extremely sensitive personal information about Plaintiff Cury located only in the systems of United States Customs and Border Protection ("CBP"). There is no public interest in the immigration records of a private individual which would outweigh his significant privacy interests, and it was extraordinarily improper for CBP to file these records on the public record while simultaneously arguing that even the *names* of third parties must be withheld "to protect the personal privacy of individuals." (Dkt. #23 at 3.) It would be a manifest injustice to force Cury or any other plaintiff to choose between litigating his right to access government records

1 about himself and keeping sensitive information contained in those records from being disclosed
2 to the general public at large.

3 Defendants' counsel has stated that they do not oppose this Motion.

4 Date: October 11, 2024

5 Respectfully submitted,

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